



NORTH CAROLINA COMMUNITY COLLEGE SYSTEM

H. Martin Lancaster, President

May 24, 2004

Honorable Jonathan S. Adelstein
Commissioner
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: WT Docket No. 03-66

I am writing on behalf of the forty-six community colleges in North Carolina that have ITFS licenses granted or applications pending that will be significantly impaired in their ability to meet the training and education needs of the State's citizens and businesses if the current proposal from the Wireless Bureau is adopted. For the past few years, we have been excited about the advent of new technologies and the prospect of band plan and rule changes requested by the ITFS community that promise new digital educational services that will enhance our service to students and the community. The benefits of the new technologies and rules changes that are vital to the economic development of North Carolina are apparently being sacrificed under the current proposal.

Specifically, we understand that a proposal from the Wireless Bureau is being circulated for rushed FCC consideration that would eliminate the eligibility restrictions on ITFS spectrum, and would reduce the amount of spectrum held by each ITFS licensee in order to accommodate new commercial users in the band. This proposal is seriously flawed.

ITFS is the only spectrum specifically allocated to support formal education. This vital educational asset must be protected, as the FCC promised to do just three years ago. As the FCC updates the technical rules for ITFS to more effectively support a range of new broadband services, **we urge you to reject misguided proposals to allow any ITFS spectrum to be licensed to commercial entities, or to reduce in any respect the total amount of spectrum allocated to ITFS.** If necessary, you must delay consideration of the proposal to a later meeting, so that our concerns can be heard.

The possibilities for future development of educational services in the ITFS band are exciting, and we plan to use the spectrum fully in the years ahead. I hope that you will support our efforts to keep this valuable educational resource. Thank you for your consideration of this important matter.

Sincerely,

H. Martin Lancaster, President